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Hon. Loretta A. Preska  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2220  
New York, NY 10007

**Re: *In re: 650 Fifth Avenue and Related Properties,*  
08 Civ. 10934 (LAP)**

Dear Judge Preska:

We write on behalf of Claimants Alavi Foundation and the 650 Fifth Avenue Company (together, “Claimants”), in accordance with the Court’s Individual Rule 2(H)(2), to request an order permitting Claimants to file under seal an unredacted copy of the 650 Fifth Avenue Company’s April 2, 2020 letter discussing the amount of reserve funds currently held to facilitate the operation and management of 650 Fifth Avenue (the “Building”).

Courts in this district have acknowledged that certain categories of documents are “commonly sealed,” including “revenue information.” *Hypnotic Hats, Ltd. v. Wintermantel Enterprises, LLC*, 335 F. Supp. 3d 566, 600 (S.D.N.Y. 2018) (quoting *Saint-Jean v. Emigrant Mortgage Co.*, No. 11-cv-2122, 2016 WL 1430775, at \*4 (E.D.N.Y. May 24, 2016)); *see also United States v. Amodeo*, 71 F.3d 1044, 1051 (2d Cir. 1995) (“[f]inancial records of a wholly owned business” are traditionally considered private and are more likely to be sealed). This Court has previously granted Claimants’ requests to file financial reports providing information about the Building’s finances under seal. (Dkt. Nos. 2218, 2224.) The letter at issue discloses information is not public and should be kept confidential: namely, the amount that the Building has in reserve. Claimants therefore request permission to file only that information under seal.

Thank you for the Court’s attention to this matter.

Respectfully submitted,



Daniel Ruzumna

Cc. Counsel of Record

**Because the Court finds that the letter at issue contains confidential commercial information, counsel’s request to file the unredacted letter under seal is granted. SO ORDERED.**



4/3/2020